

November 27, 2019



Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street NW
Washington, DC 20554

Re: Establishing the Digital Opportunity Data Collection, WC Docket No. 19-195; Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, WC Docket No. 19-285; Modernizing the FCC Form 477 Data Collection Program, WC Docket No. 11-10

Dear Ms. Dortch:

Next Century Cities is a nonprofit 501(c)(3) coalition comprised of over 200 member municipalities across the United States that work to bring fast, affordable, reliable broadband to their constituents. Our organization represents local broadband leaders and advocates for telecommunications policies that support local connectivity initiatives.

On November 25, 2019, Next Century Cities hosted a call with Commissioner Geoffrey Starks and his Special Advisor, Dr. Alisa Valentin, to discuss questions about broadband deployment and access. Call participants included Next Century Cities' staff members: Francella Ochillo, Executive Director, Jessica Del Fiacco, Communications Specialist, and Christopher Mitchell, Policy Director. Nine Next Century Cities members from local governments participated as well: Pamela Marcus-Bause, Larimer County, Colorado; Rondella Hawkins, Austin, Texas; Howell Herring, Tucson, Arizona; Brandon Adams, Jacksonville, Illinois; Bruce Patterson, Ammon, Idaho; Aldona Valicenti, Lexington, Kentucky; David Young, Lincoln, Nebraska; Jeanne Holm, Los Angeles, California; and Rebecca Landry, Keene, New Hampshire.

The discussion started with a general suggestion from Aldona Valicenti, City of Lexington, that the Commission's policy proposals should undergo operational tests before implementation. She asked about how operational tests are conducted at the federal agency level and best practices for operational policy testing more broadly.

Francella Ochillo raised a question submitted prior to the call from Fort Collins, Colorado's Citizens Broadband Committee, about the level of transparency required of providers who accept Connect America Fund money for projects in unserved or underserved areas. The advocate also asked for the best contact for questions about Connect America Fund work being done in their community.



Regarding broadband data, Christopher Mitchell inquired about the Commission's plans to track pricing data. Bruce Patterson, City of Ammon, explained that the current broadband data collection mechanisms do not adequately assess open access networks. Because speed tests are catalogued according to internet service provider, data reflects a combination of customers who may be receiving service via different infrastructure providers. The City of Ammon is an open access network infrastructure provider, and no data is collected that is specific to the city's infrastructure services. Patterson emphasized that infrastructure-specific data collection is important, and urged the Commission to collect this type of data in the future.

Finally, Howell Herring, City of Tucson, submitted concerns that the Commission's attempt to fast-track 5G deployment limits local control. He asked why preemption was necessary when most local governments are naturally incentivized to support the buildout of new technologies.

This call was an unusual opportunity for Next Century Cities' members to discuss broadband policy with a Commissioner. We urge the Commission to create more opportunities to hear local perspectives directly from local leaders.

Respectfully submitted,

/s/ Cat Blake

Cat Blake
Senior Program Manager

